U.S. EPA REGION II
SPCC INSPECTION CHECKLIST

FACILITY NAME Clark Oil Refinery
ADDRESS 1352 E. Kedzie
Blue Islands IL 60406

INSPECTION DATE 8/16/94

☐ DO NOT COMPLETE
☐ MUST BE COMPLETED

APPENDIX "C" - SPCC INSPECTION CHECKLIST	ADEQUATELY ADDRESSED					
	PLAN			FIELD		
	YES	NO	N/A	YES	NO	N/A
40 CFR 112.3 - Requirements for Preparation and Implementation of Spill Prevention Control and Countermeasure (SPCC) Plans						
(b) Plan prepared within 6-months after facility became operational.	✓			✓		
Plan implemented within one year after facility became operational.	✓			✓		
(d) Professional Engineer's (P.E.) Certification.	✓			✓		
(e) Plan available during normal 8-hour day.	✓				✓	
(f) (1) Extension of time to prepare and implement Plan.			✓			✓
(2) Required submissions for requests of time extensions.			✓			✓
40 CFR 112.4 - Amendment of SPCC Plan by Regional Administrator (R.A.)						
(a) Whenever a facility discharges more than 1,000 gallons of oil into navigable waters or has two reportable spills within 12 months, the following information shall be submitted to the RA:	✓				✓	
(1) Name of the facility: (1)						
(2) Name(s) of the owner or operator: (2)						
(3) Location of the facility: (3)						
(4) Date and year of the initial facility operation: (4)						
(5) Maximum storage or handling capacity: (5)						
(6) Description of the facility including maps and diagrams: (6)						
(7) A complete copy of the SPCC Plan including amendments: (7)						
(8) The causes of the spill, including failure analysis: (8)						
(9) The corrective actions and/or countermeasures taken: (9)						
(10) Additional preventive measures taken or contemplated: and (10)						
(11) Other information as required by R.A. (11)						
(c) All above information sent to applicable State agency.						
(d & e) R.A. requirements for SPCC Plan amendment (Explain in Report).						
(f) Appeal of amendments by facility.						
40 CFR 112.5 - Amendment of SPCC Plans by the Owners or Operators.						
(a) Amendment (and implementation within 6 months) of changes to Plan.						
(b) Three (3) year review and evaluation of SPCC Plan by management.						
(c) Amendments are certified by a Professional Engineer.						

DISCUSSION OF §112.3 TO §112.5:

APPENDIX "C" - SPCC INSPECTION CHECKLIST	ADEQUATELY ADDRESSED					
	PLAN			FIELD		
	YES	NO	N/A	YES	NO	N/A
40 CFR 112.7 - Guidelines for the Preparation and Implementation of Spill Prevention Control & Countermeasure Plans						
(First Paragraph:)						
- Full approval of management with authority to commit resources.						
- Discussion and implementation schedule of items to be installed.						
- Plan follows sequence of §112.7						
(a) Description of spill events, including corrective actions.						
(b) Direction, rate of flow, and quantity of potential oil spills.						
(c) Secondary, containment and/or diversionary structures:						
(i) Dikes, berms or retaining walls sufficiently impervious; (i)						
(ii) Curbing; (ii)						
(iii) Culverting, gutters or other drainage systems; (iii)						
(iv) Weirs, booms or other barriers; (iv)						
(v) Spill diversion ponds; (v)						
(vi) Retention ponds; and/or (vi)						
(vii) Sorbent materials. (vii)						
(d) If the installation of structures or equipment as listed in §112.7(c) is not practicable as determined by the facility, the impracticability should be clearly demonstrated.						
Describe impracticability:						
The following should also be provided: (1) A strong oil spill contingency plan [40 CFR 109].						
(2) A written commitment of manpower, equipment and materials required to handle any quantity of oil discharged.						
Describe Contingency Plan:						
(e)(1) Facility Drainage (onshore; (excluding production facilities)						
(i) Drainage from diked storage areas have valves or other positive means to *prevent an oil spill.*						
(ii) Valves should be manual, open-and-closed design. Retained stormwater from diked areas should be inspected before drainage [(e)(2)(iii)(B,C & D)].						
(iii) Plant drainage from undiked areas are equipped with either: Ponds, lagoons or catchment basins to retain oil; or						
(iv) A diversion system at the discharge point that will contain a spill and return it to the facility.						
(v) Where more than one drainage water treatment unit is used, the transfer between units should be by either:						
Natural hydraulic (gravity) flow; or						
Two "lift" pumps with at least one permanently installed.						
Drainage will prevent oil from reaching navigable waters.						
DISCUSSION OF §112.7(a) TO §112.7(e)(1):						

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40 CFR 112.7 - Guidelines for the Preparation and Implementation of Spill Prevention Control & Countermeasure Plans (Continued):						
(e) (2) Bulk Storage Tanks (onshore); (excluding production facilities)						
(i) Tank material/construction is compatible with fluid stored.						
(ii) Secondary containment is provided for the largest single tank plus an allowance for precipitation.						
Dike walls and floor are "sufficiently impervious."						
(iii) Drainage of rainwater from diked areas, by-passing treatment, is accomplished according to the following:						
(A) Normally the by-pass valve is sealed closed;						
(B) The rainwater is inspected;						
(C) The by-pass valve is opened/closed under supervision; and						
(D) Records are kept of bypassing and drainage events.						
(iv) Buried metallic storage tank:						
New tanks are coated and wrapped to reduce corrosion;						
Cathodic protection is provided for new tanks as required;						
Tanks are pressure tested on a scheduled basis.						
(v) Partially buried metallic tanks are avoided unless adequate coating is provided for the buried portion.						
(vi) Aboveground tanks are tested by one of the following methods:						
Hydrostatic testing;						
Visual inspection; and/or						
Shell thickness testing (comparison records maintained).						
All bulk storage tanks are inspected periodically.						
(vii) Internal heating coil leakage is controlled by the following:						
(A) Monitoring the stream return or exhaust lines for oil;						
Passing the steam lines through a separation system; or						
(B) Installing external heating system.						
(viii) Tanks are fail-safe engineered by one of the following:						
(A) High liquid level alarms with an audible or visual signal;						
(B) High liquid level pump cutoff devices;						
(C) Direct signal between the tank gauger and pumping station;						
(D) A fast response system to detect oil level such as digital computers, telepulse, direct visual gauges, or equal.						
(E) Sensing devices should be inspected/tested periodically.						
(ix) Plant effluent observed frequently to detect upsets.						
(x) Oil leaks from tanks should be promptly corrected.						
(xi) Mobile or portable oil storage tanks should be properly located to prevent oil from reaching navigable waters.						
Secondary containment should be provided.						

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40 CFR 112.7 - Guidelines for the Preparation and Implementation of Spill Prevention Control & Countermeasure Plans (Continued)						
(e)(3) Facility transfer operations, pumping, and in-plant process.						
(i) Buried pipelines are wrapped/coated to reduce corrosion.						
(ii) Pipeline terminal connections are capped or blank-flanged if not in service or in expansion and contraction.						
(iii) Pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contraction.						
(iv) All aboveground pipelines are inspected periodically.						
(v) Vehicles entering the facility are warned, verbally or by signs, to avoid damaging above ground piping.						
(e)(4) Facility tank car and tank truck loading/unloading rack.						
(i) Loading/unloading procedures meet the minimum requirements of the Department of Transportation.						
(ii) Where drainage does not flow into a catchment basin or a treatment facility, the rack area should have a drainage system with a containment volume greater than the largest compartment of any tank car or truck.						
(iii) An interlocked warning light or physical barrier system or warning signs should be provided to prevent vehicular departure before disconnect of the transfer lines.						
(iv) Drains and outlets on tank cars and tank trucks are inspected for leakage prior to filling and departure.						

DISCUSSION OF §112.7 (First Paragraph) to §112.7(e)(4)

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40 CFR 112.7 - Guidelines for the Preparation and Implementation of Spill Prevention Control & Countermeasure Plans (Continued)						
(e)(5) Oil production facilities (onshore).						
(ii) (A) Secondary containment drains are closed and locked.						
The water should be inspected before drainage.						
Accumulated oil should be disposed of by approved methods.						
(B) Ditches, sumps, traps, etc. should be kept clean of oil.						
(iii)(A) Tank material/construction is compatible with fluid.						
(B) Tanks and treatment facilities have secondary containment.						
(C) Tanks should be visually inspected and defects corrected.						
(D) Tank batteries should be fail-safe engineered as follows:						
(1) Adequate tank capacity;						
(2) Overflow equalizing lines between tanks;						
(3) Adequate vacuum protection to prevent tank collapse; or						
(4) High liquid level alarms.						
(iv) All aboveground equipment should be periodically inspected, corrosion protected, and repaired as necessary.						
Preventive maintenance programs should be utilized.						
(e)(6) Oil drilling and facilities (onshore).						
(i) Equipment should be located to prevent spilled oil from reaching navigable waters.						
(ii) Catchment basins or diversion structures should be provided to intercept and contain oil spills.						
(iii) A blowout prevention (BOP) assembly and well control system should be installed as necessary to prevent release of oil.						
(e)(7) Oil drilling, production or facilities (offshore).						

DISCUSSION OF §112.7(e)(5) to §112.7(e)(6):

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40 CFR 112.7 - Guidelines for the Preparation and Implementation of Spill Prevention Control & Countermeasure Plans (Continued)						
(e)(8) Inspections and records. The required inspections should follow written procedures and should be included in the SPCC Plan.						
(e)(9) Security (excluding oil production facilities). (i) Plans handling, processing and storing oil should be fenced.						
Entrance gates should be locked and/or guarded when the plant is unattended or not in production.						
(ii) Any valves which permit outflow of a tank's contents should be locked closed when in non-operating or non-standby status.						
(iii) Starter controls on all oil pumps in non-operating or non-standby status should be locked, electrically isolated in the "off" position, or accessible only to authorized personnel.						
(iv) The loading/unloading connections of oil pipelines should be capped or blank-flanged when not in service or on standby status for an extended time period.						
(v) Facility lighting should be commensurate with the type and location of the facility. Lighting should be adequate to discover spills and to prevent acts of vandalism.						
(e)(10) Personnel, training and spill prevention procedures. (i) Personnel are properly instructed in the operation and maintenance of the equipment used to prevent oil discharges and the pollution control laws, rules and regulations.						
(ii) A person accountable for oil spill prevention should be designated within the Plan.						
(iii) Spill prevention briefings for operating personnel should be conducted on a scheduled, periodic basis.						

DISCUSSION OF §112.7(e)(8) to §112.7(e)(10):